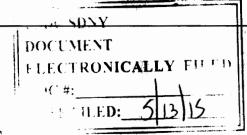
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U.S. Department of Justice

United States Attorney Southern District of New York



The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

MEMO ENDORSED 2,2015 stiglist

Order signal

Consent

Consent

May 12, 2015

VIA ECF

Hon. Colleen McMahon United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

> United States v. Mirilashvili et al., 14 Cr. 810 (CM) Re:

Dear Judge McMahon:

We write with respect to the ongoing production of discovery in the above-captioned case. Because we anticipate that current and future productions may contain significant amounts of personal information regarding third-parties – such as names, dates of birth, social security numbers, and the like – the Government believes a protective order is appropriate. We have drafted a proposed order which we have shared with counsel for all defendants in this case, and each has consented, on behalf of his or her client, to the entry of such an order.

Accordingly, and so as to facilitate continued productions, the Government would respectfully request that the Court endorse the proposed order which, as noted, has previously been shared with and approved by defense counsel.

Respectfully submitted,

PREET BHARARA United States Attorney

By:

Edward B. Diskant Brooke E. Cucinella Assistant United States Attorneys (212) 637-2294/2477

Cc: Defense counsel (via ECF)

Enclosure